

POLLOCK | COHEN LLP

60 BROAD STREET, 24TH FLOOR
NEW YORK, NEW YORK 10004
(212) 337-5361

CONTACT:

Adam Pollock
Adam@PollockCohen.com
(646) 290-7251

APPLICATION GRANTED
SO ORDERED *Vernon S. Broderick*
VERNON S. BRODERICK
U.S.D.J. 7/15/2020

July 7, 2020

VIA ECF

Hon. Vernon S. Broderick
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Hon. Debra C. Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *Recovery Effort Inc. v. Zeichner Ellman & Krause LLP, et al.*, No. 19-cv-05641 (VSB)
Manhattan Safety Maine, et al. v. Michael Bowen, et al., No. 1:19-cv-5642 (LGS/DCF)

Dear Judges Broderick and Freedman:

We represent plaintiffs in the above-captioned actions. We write to respectfully advise that Judge James L. Garrity of the Bankruptcy Court, in the Orly Genger bankruptcy proceeding (No. 19-13895-JLG), has directed that these matters should be stayed through August 25, 2020.

On June 8, 2020, we filed a motion seeking a determination that these actions are not subject to the automatic stay. (ECF no. 258-1 in no. 19-13895.) Objections to the motion were filed by various parties, including Deborah J. Piazza, the Chapter 7 Trustee of the bankruptcy estate of Orly Genger. The hearing on that motion was scheduled for July 8, 2020.

Last Thursday, July 2, 2020, the Bankruptcy Court held a discovery conference with respect to other matters pending in the bankruptcy case. During that conference, Judge Garrity pushed back the hearing date on our motion to August 25, 2020 and asked that these matters be stayed pending the Bankruptcy Court's determination of the motion. Judge Garrity further indicated that the hearing date would likely move back past the August 25 placeholder date.

Accordingly, consistent with Judge Garrity's direction, we respectfully submit that these matters should be stayed until the resolution of the pending motion to dismiss the bankruptcy case, which is currently scheduled to be heard on August 25.

Thank you for Your Honors' consideration in this matter.

Respectfully submitted,

/s/ Adam Pollock

Adam Pollock

Hon. Vernon S. Broderick

Hon. Debra C. Freeman

July 7, 2020

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cc: Rocco Cavaliere, Esq. (via email)
(Counsel to the Bankruptcy Trustee)

All counsel of record (via ECF)